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"LexisNexis Risk Solutions, Inc.," "LexisNexis
ChoicePoint, Inc.," "LexisNexis Seisint, Inc., d/b/a
Accurint," and "LexisNexis Group Inc."

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

LISA LIBERI, *et al.*,

Plaintiffs,

v.

ORLY TAITZ, *et al.*,

Defendants.

Case No. 8:11-cv-00485-AG-AJW

**STIPULATION TO CONTINUE
HEARING DATE ON
LEXISNEXIS DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT**

Honorable Judge Andrew J. Guilford

First Amended Complaint Filed:
June 17, 2011

Plaintiffs Lisa Liberi, Lisa M. Ostella, Go Excel Global, Philip J. Berg,
Esquire and the Law Offices of Philip J. Berg (collectively, "Plaintiffs") and

Defendants Reed Elsevier Inc., LexisNexis Risk and Information Analytics Group Inc., “LexisNexis, Inc.,” “LexisNexis Risk Solutions, Inc.,” “LexisNexis ChoicePoint, Inc.,” “Lexis Nexis Seisint, Inc., d/b/a Accurint,” and “LexisNexis Group, Inc.” (collectively, the “LexisNexis Defendants”), through their respective attorneys, hereby stipulate and jointly request that the Court continue the May 14, 2012 hearing on the LexisNexis Defendants’ Motion for Summary Judgment to May 21, 2012, as follows:

WHEREAS:

1. On June 13, 2011, before the LexisNexis Defendants were named as parties in the matter, the Court held an Early Scheduling Conference in which the Court set the following deadlines (*see* Docket No. 225):

Discovery cutoff	March 5, 2012
Pretrial Conference	May 21, 2012
Start of Trial	June 5, 2012

2. On March 13, the Court granted the LexisNexis Defendants leave to file a motion for summary judgment;

3. On April 4, 2012, the LexisNexis Defendants filed their Motion for Summary Judgment noticing May 14, 2012, as the hearing date for the Motion;

4. On April 17, 2012, the Court issued an Order continuing the hearing on Plaintiffs’ Motion for Summary Judgment against Todd Sankey and the Sankey Firm, (collectively, the “Sankey Defendants”), which was previously noticed for April 23, 2012, to May 21, 2012 (*See* Docket No. 497);

5. The parties agree that it would be efficient from both the Court’s and the parties’ perspectives to also continue the hearing on the LexisNexis Defendants’ Motion to May 21, 2012, so that both summary judgment motions are heard on the

1 same date;

2 6. No party has previously sought to reschedule the hearing on the
3 LexisNexis Defendants' Motion for Summary Judgment;

4 7. The parties previously wrote to the Court regarding these matters on
5 April 20, 2012, and are filing the present Stipulation to facilitate the requests
6 contained in that correspondence.

7 IIT IS HEREBY STIPULATED AND AGREED, through counsel for the
8 parties, that the hearing date on the LexisNexis Defendants' Motion for Summary
9 Judgment is continued to May 21, 2012.

10 Dated: April 24, 2011

LAW OFFICES OF PHILIP J. BERG

11 By: Philip J. Berg with permission
12 Philip J. Berg

13 Attorneys for Plaintiffs
14 Lisa Liberi, Lisa M. Ostella, Go
15 Excel Global, Philip J. Berg,
16 Esquire and the Law Offices of
17 Philip J. Berg

18 Dated: April 24, 2012

JAMES F. MCCABE
MORRISON & FOERSTER LLP

19 By: /s/ James F. McCabe
20 James F. McCabe

21 Attorneys for Defendants

22 Reed Elsevier Inc., LexisNexis Risk
23 and Information Analytics Group Inc.,
24 "LexisNexis, Inc.," "LexisNexis Risk
25 Solutions, Inc.," "LexisNexis
26 ChoicePoint, Inc.," "LexisNexis
27 Seisint, Inc., d/b/a Accurint," and
28 "LexisNexis Group Inc."